

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:15-CR-0354-SNLJ
)
STEVEN BLAKENEY,)
)
)
)
 Defendant.)

MOTION TO CONTINUE OBJECTIONS TO
THE PRESENTENCE INVESTIGATION

COMES NOW, Clinton R. Wright, Attorney for Defendant, STEVEN BLAKENEY, and requests that the Objections to the Presentence Report due today be continued to Tuesday May 3rd for the following reasons:

1. That this matter was been set before the Court for Bond Revocation on Tuesday April 26th and since continued to Friday April 29th.
2. This had created both additional amounts of investigation and less access for the Attorney to meet with Defendant Blakeney.
3. Defendant has been moved to a “Lock- Down” status since Friday April 22nd.
4. After meeting with Pretrial regarding the Bond Violation it became necessary to devote all resources to that current matter.
5. This continuance is not requested in order to prolong the matter but is the necessary means in order to accomplish the ends of justice.

WHEREFORE, Defendant STEVEN BLAKENEY prays that this matter be continued to May 3rd 2016.

Respectfully Submitted,

By/s/ Clinton R. Wright
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CERTIFICATE OF SERVICE

I hereby certify that on April 27th, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system, to be filed upon, Assistant United States Attorney Reggie Harris.

/s/ Clinton R. Wright
Clinton R. Wright #40820MO